

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Elizabeth Ann Wirth,
Debtor

Case No.: 18-26528-bhl
Chapter 13

NOTICE AND OBJECTION TO
TRUSTEE SCOTT LIESKE'S MOTION TO DISMISS

PLEASE TAKE NOTICE that a telephone hearing will be held before the Honorable Brett H. Ludwig, United States Bankruptcy Judge, on April 23, 2019 at 1:00 pm to consider the Trustee's Motion to Dismiss this Case. **To appear by telephone, you must call the Court conference line at (888) 808-6929, access code: 5457889 # before the scheduled hearing time.** Please note that the Court may already be in session, so please wait quietly on the telephone for your case to be called. The Debtor is welcome, but not required to participate in this hearing.

NOW COMES the above-named debtor, Elizabeth Ann Wirth by and through her Attorneys, MILLER & MILLER LAW, LLC, and by Attorney Deborah A. Stencel, hereby object to the Motion to Dismiss case.

As grounds for such objection and requests, the Debtor asserts as follows:

1. Debtor will resume payments in April 2019.
2. Debtor had unexpected transmission repairs and had intended to make her February payment in March, thinking that she could catch up before a motion to dismiss was filed.
3. Unforeutnately, one was filed on March 13 when only one payment was late.
4. The car repairs were significant so making up the payments would be difficult and resuming in April makes more sense giving Debtor a greater chance of success moving forward.

WHEREFORE, the Debtor requests that the Court deny the Trustee's Motion and further request that this matter be set for hearing.

Dated at Milwaukee, Wisconsin this 27th day of March, 2019.

/s/Deborah A. Stencel

Deborah A. Stencel
MILLER & MILLER LAW, LLC
Attorney for Debtor

MILLER & MILLER LAW, LLC
633 W. Wisconsin Ave., Suite 500
Milwaukee, WI 53203
(414) 277-7742

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CERTIFICATE OF MAILING

Deborah A. Stencel an attorney, certifies that on March 27, 2019, the foregoing Objection to Trustee Scott Lieske's Motion to Dismiss Case, was served by United States Mail or by ECF to the following named persons at their proper post office address after their respective names as indicated:

Elizabeth Ann Wirth
988 Knollwood Rd
West Bend, WI 53095

Chapter 13 Trustee
Scott Lieske - via ECF

U.S. Bankruptcy Trustee- via ECF

/s/Deborah A. Stencel

Deborah A. Stencel
MILLER & MILLER LAW, LLC
Attorney for Debtor

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